

FILED

UNITED STATES DISTRICT COURT

for the

Western District of Texas

April 6, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY:  DEPUTYUnited States of America
v.Case No. **1:22-MJ-346-ML**Juan Ignacio Soria Gamez*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 22, 2022, March 1, 2022 in the county of Williamson in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

Title 21 U.S.C. § 841 (a)(1)

Possession with Intent to Distribute a Controlled Substance

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: April 6, 2022City and state: Austin, Texas*Complainant's signature*Ronald P. Enriquez, DEA TFO*Printed name and title**Judge's signature*Mark Lane - United States Magistrate Judge*Printed name and title*

Affidavit

I, Ronald Enriquez, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Task Force Officer of the Drug Enforcement Administration (DEA). As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1).
2. I have been employed as a Task Force Officer for approximately five years, and a Police Officer for approximately twenty years. I have received extensive training pertaining to narcotic investigations and the investigations of various crimes which arise from drug trafficking activities.
3. I have received specialized training on the subject of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, distribution, and importation of controlled substances, as well as methods used to finance drug transactions.
4. I have participated in and conducted investigations of violations of various State and Federal criminal laws, including unlawful possession with intent to distribute controlled substances, distribution of controlled substances, use of a communication facility to commit narcotic offenses, importation of controlled substances, conspiracy to import, possess and distribute controlled substances, and money laundering, all in violation of Title 21 and Title 18, United States Code. These investigations resulted in arrests of individuals who have imported, smuggled, received and distributed controlled substances, including cocaine, marijuana, heroin,

methamphetamine and pharmaceutical controlled substances and the arrest of individuals who have laundered proceeds emanating from those illegal activities. Also, these investigations resulted in seizures of illegal drugs / controlled substances and proceeds from the distribution of those illegal drugs / controlled substances.

5. I have directed confidential informants and cooperating witnesses to successfully infiltrate various-sized narcotic enterprises via intelligence gathering, participation in consensual recordings and monitored purchases of controlled substances. I have executed search warrants for controlled substances and I have conducted surveillance in connection with numerous narcotic investigations.

6. I am familiar with the operations of illegal international drug trafficking organizations in various parts of the world, including the Central America, Mexico, India, Texas, and throughout the world.

7. I am familiar with the ways in which narcotic traffickers conduct their business, including methods of importing and distributing narcotics, money laundering, the use of cellular telephones and the internet to facilitate their illegal acts, and the use of numerical codes and code words to conduct drug transactions. My training and experience as a Task Force Officer of the DEA, my conversations with other Special Agents/Task Force Officers of the DEA, and state and local Detectives familiar with narcotics trafficking and money laundering matters, form the basis of the opinions and conclusions set forth below, which I drew from the facts set forth herein.

RELEVANT FACTS

8. Affiant submits the following “specific and articulable facts” showing that there is probable cause to believe that Juan Ignacio Soria Gamez is engaged in a conspiracy to distribute controlled substances, and has distributed controlled substances as set forth below.

9. Between March of 2020 and April of 2022, Austin, Texas and the surrounding cities have experienced a wave of overdose investigations in relation to the illegal distribution of schedule II-V prescription pills, along with counterfeit oxycodone pills. The illegal prescription pills that are being diverted and sold, along with the counterfeit oxycodone pills, are an extreme danger to the public. Cartels and domestic clandestine pill press operations are manufacturing counterfeit oxycodone pills containing Fentanyl, a synthetic opioid that is lethal in minute doses.

10. Agents, along with other law enforcement officials, have reason to believe that the overdose investigations are linked to several common sources of supply (SOS). During these investigations, officers and agents learned that Juan Ignacio Soria Gamez was a possible source of supply for bulk amounts of counterfeit oxycodone pills in the Austin, Texas area. Cedar Park Police Department Detective Sean Fallon utilized a confidential source herein referred to as CS1 to make two controlled purchases of counterfeit Oxycodone containing fentanyl from Juan Ignacio Soria Gamez. It should be noted that this CS1 has provided credible and reliable information in the past that has led to the seizure of controlled substances. In furtherance of this investigation, Leander Police Department Detective David Wilson utilized a separate Confidential Source herein referred to as CS2 to make five controlled purchases of suspected counterfeit Oxycodone believed to contain fentanyl from Juan Ignacio Soria Gamez. It should be noted that this CS2 has provided credible and reliable information in the past that has led to the seizure of controlled substances.

11. On February 22, 2022 Detective Fallon utilizing a CPPD CS1 arranged for a controlled purchase of suspected counterfeit Oxycodone containing fentanyl from Juan Ignacio Soria Gamez. The controlled purchase took place on the same date at approximately 8:57pm at the residence of Juan Ignacio Soria Gamez located at 149 S. Bagdad Rd #2301, Leander, Tx. Prior to the controlled purchase taking place, members of CPPD Narcotics Unit and Leander PD established surveillance at this location. Once units were in place, CS1 headed to the location being followed by Detective Fallon and arrived on-scene shortly after. Once CS1 arrived, Detective Fallon observed CS1 approach the door at 149 S. Bagdad Rd #2301, Leander, Tx and make contact with Juan Ignacio Soria Gamez. After a brief conversation, Juan Ignacio Soria Gamez provided CS1 with two Oxycodone tablets for the agreed upon amount of \$75.00 in pre-recorded funds. Once the transaction was complete, CS1 returned directly to Detective Fallon and provided him with the two Oxycodone pills that CS1 purchased from Juan Ignacio Soria Gamez. Detective Fallon advised that CS1 and his/her vehicle were searched prior to and immediately following the transaction with negative results. Detective Fallon described the Oxycodone purchased as two round blue pills marked "M" on one side and "30" on the other. Detective Fallon conducted a field test to detect the presence of fentanyl. The field test yielded positive results for the presence of fentanyl. Detective Fallon then processed and weighed the two Oxycodone/Fentanyl pills weighing .2 grams and submitted them to DPS Laboratory for testing and analysis. On March 31, 2022, Detective Fallon received the DPS Lab Results confirming the presence of fentanyl.

12. On March 1, 2022 Detective Fallon utilizing CS1 arranged for a controlled purchase of suspected counterfeit Oxycodone containing fentanyl from Juan Ignacio Soria Gamez. The Controlled Purchase took place on the same date at approximately 6:00 pm at 204 South Brushy Street, Leander, Tx. This location was provided to the CS1 by Juan Ignacio Soria Gamez when

arranging the transaction. Prior to the controlled purchase, members of CPPD Narcotics Unit established surveillance at this location. Detective Fallon then provided CS1 with \$170.00 in pre-recorded funds. Once surveillance units were in place, Detective Fallon acting in undercover capacity, drove CS1 towards 204 South Brushy Street, Leander, Tx. Detective Fallon dropped CS1 off just down the street from target location and members of the surveillance team observed CS1 meet with Juan Ignacio Soria Gamez at 204 South Brushy Street, Leander, Tx. After a brief conversation, Juan Ignacio Soria Gamez provided CS1 with the 5 Oxycodone and CS1 provided Juan Ignacio Soria Gamez with the \$170.00 in pre-recorded funds. Once the transaction was complete, CS1 departed and walked directly back to Detective Fallon. CS1 provided Detective Fallon with the five Oxycodone pills purchased from Juan Ignacio Soria Gamez. Detective Fallon advised that CS1 and his/her vehicle were searched prior to and immediately following the transaction with negative results. Detective Fallon processed and weighed the five pills purchased per CPPD policy. The weight of the five Oxycodone/Fentanyl pills was confirmed to be .8 grams. Detective Fallon described the Oxycodone purchased as five round blue pills marked "M" on one side and "30" on the other. Detective Fallon submitted the 5 round blue pills marked M/30 to the DPS Laboratory for testing and analysis. On March 18, 2022, Detective Fallon received the DPS Lab Results confirming the presence of fentanyl.

13. On February 23, 2022 Leander PD Detective Wilson utilizing CS2 arranged for a controlled purchase of suspected counterfeit Oxycodone containing fentanyl from Juan Ignacio Soria Gamez. The controlled purchase took place on February 24, 2022 at 149 S. Bagdad Rd #2301, Leander, Tx. This location was provided to the CS2 by Juan Ignacio Soria Gamez when arranging the transaction. Prior to the controlled purchase, members of Leander PD Special Investigations Unit established surveillance at this location. Detective Wilson provided CS2 with

pre-recorded funds for the transaction and followed CS2 directly to 149 S. Bagdad Rd #2301, Leander, Tx. While at this location, CS2 completed a purchase of five Oxycodone tablets marked "M" on one side and "30" on the other for the agreed upon price. Once the transaction was complete, CS2 departed and was followed directly to a predetermined meet location by Detective Wilson. Upon arrival at the meet location, CS2 provided Detective Wilson with the five Oxycodone pills purchased from Juan Ignacio Soria Gamez. Detective Wilson advised that CS2 and his/her vehicle were searched prior to and immediately following the transaction with negative results. Detective Wilson then processed the five Oxycodone pills as evidence per Leander PD policy and submitted them to the DPS Laboratory for testing and analysis. Lab results are pending as of this time.

14. Detective Wilson and Leander PD Special Investigations Unit conducted three more controlled purchases of suspected counterfeit Oxycodone believed to contain fentanyl from Juan Ignacio Soria Gamez. CS2 was utilized in all three additional purchases. The three additional controlled purchases were conducted in the same manner as the previous purchase and all additional purchases took place at the residence of Juan Ignacio Soria Gamez located at 149 S. Bagdad Rd #2301, Leander, Tx. The first of the three additional purchases took place on March 2, 2022 in which ten and one half, suspected counterfeit Oxycodone believed to contain fentanyl were purchased from Juan Ignacio Soria Gamez. The second of the three additional purchases took place on March 10, 2021 in which ten suspected counterfeit Oxycodone believed to contain fentanyl were purchased from Juan Ignacio Soria Gamez. The third additional purchase took place on March 24, 2021 in which ten suspected counterfeit Oxycodone believed to contain fentanyl were purchased from Juan Ignacio Soria Gamez. All the pills that were purchased in these

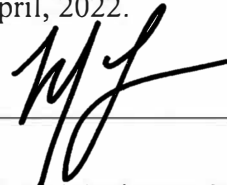
additional transactions were processed per Leander PD policy and submitted to the DPS Laboratory for testing and analysis. The lab results from these additional purchases are currently

Signed in this 5th day of April, 2022.

A handwritten signature in blue ink, appearing to read 'R. Enriquez', written over a horizontal line.

Ronald Enriquez, Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to before me electronically this 6th day of April, 2022.

A handwritten signature in black ink, appearing to be a stylized 'MJ', written over a horizontal line.

United States Magistrate Judge